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May 7, 2014

VIA ELECTRONIC FILING

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WC Docket No. 13-266
Application of Qwest Communications Company, d/b/a CenturyLink QCC,
for Authority to Discontinue Domestic Telecommunications Services

Dear Commissioners:

Idaho Power Company ("Idaho Power") submits this *ex parte* letter regarding the Application of Qwest Communications Company, d/b/a CenturyLink QCC, ("CenturyLink") to Discontinue Domestic Telecommunications Services with the Federal Communications Commission ("Commission"). Idaho Power understands that the Commission has not automatically granted CenturyLink's Application in this case. By this letter, Idaho Power seeks to provide the Commissioners with information regarding the confusion it experienced with CenturyLink's notices and challenges it would face if CenturyLink's desired termination of services occurs prior to December 2015.

Idaho Power is an electric utility, with service territory in both Idaho and Oregon. Idaho Power is regulated by the Federal Energy Regulatory Commission ("FERC"), Idaho Public Utilities Commission, and the Public Utility Commission of Oregon. Idaho Power is a CenturyLink customer and uses CenturyLink's Frame Relay service for applications critical to its core services, such as automated metering infrastructure and electrical energy management system control. As a regulated electric utility, Idaho Power is required to maintain certain FERC and North American Electric Reliability Corporation ("NERC") cyber security standards. The Frame Relay services CenturyLink seeks to discontinue is 64 kbit/sec OSI Layer 2, and is the most cost-effective solution available that exempts Idaho Power from certain NERC Critical Infrastructure Protection ("CIP") standards.

Notice Concerns. Based upon verbal clarifications of the notices mailed to Idaho Power, Idaho Power did not receive clear notice from CenturyLink of the entire scope of the proposed discontinuance until February 5, 2014. Idaho Power received a letter from

CenturyLink on October 23, 2013, describing CenturyLink's plans to discontinue its QCC Frame Relay and QCC ATM service by December 15, 2014. Although the letter stated that the discontinuance applied to interstate and intrastate services, Idaho Power representatives met with CenturyLink representatives who definitively stated that the intended discontinuance only applied to services Idaho Power utilized to cross local access transport area ("LATA") boundaries. CenturyLink emphasized that the term "QCC" was an internal term that, in Idaho Power's case, limited the scope of the Frame Relay services impacted by the letter to one QCC Frame Relay circuit that crosses LATA boundaries in Oregon.

Idaho Power received a second notice on February 5, 2014, after the comment period in this docket had passed, stating the discontinuation of services applied to its Frame Relay and ATM services by December 31, 2014. It did not contain the qualifying term "QCC" as the earlier letter. This terminology change, as Idaho Power was told it is used at CenturyLink, significantly increases the negative impact of the discontinuance upon Idaho Power. Idaho Power utilizes approximately 90 Frame Relay circuits within the southern Idaho LATA. Idaho Power would likely have taken different steps if it had not been informed by CenturyLink that the October 23, 2014, notice was specifically limited to one QCC Frame Relay circuit.

Replacement Services. As stated above, Idaho Power uses Frame Relay services for communication of information critical to its services, such as automated metering infrastructure and control over the energy management system. CenturyLink has proposed three replacement options:

1. IQ Networking Private Port service, which is an OSI Layer 3 service. Utilization of OSI Layer 3 services would require enhanced cyber and physical security measures to meet NERC's CIP standards for 91 remotely-located substations.
2. Metro Optical Ethernet, which is an OSI Layer 2 product with 3Mbit/sec bandwidth. The cost of this service is over six times Idaho Power's current monthly expense for the Frame Relay service.
3. Ethernet over DS1, an OSI Layer 2 product with 1 Mbit/sec bandwidth. The monthly cost is approximately 1.5 times more than the current Frame Relay monthly cost.

All of the above-listed options will cost in excess of \$3.1 million, including engineering, design, materials, and construction. It's estimated that the earliest such work can be completed is in December of 2015. While the third option is the most palatable to Idaho Power, it, like the others, creates significant timing and conversion cost issues. Conversion from Frame Relay to the Ethernet over DS1 technology will require access devices at both ends of the Frame Relay circuits to be replaced with a different type of equipment. It will also require changes to substation hardened equipment. These

changes cannot occur without leaving a one year gap (December 2014 through December 2015) between CenturyLink's proposed termination date and the construction completion date. Therefore, Idaho Power believes that none of CenturyLink's proposed options constitute a reasonable substitute to replace its current Frame Relay services in terms of bandwidth, security, cost, and replacement timeline. Additionally, no reasonable substitute is available through other providers.

Idaho Power understands the struggles associated with utilizing technology that is no longer supported by third-party providers. However, CenturyLink's Application states that it has been aware of this upcoming discontinuation of support since December 31, 2011. CenturyLink should have taken steps to implement a reasonable replacement service and provide its customers with commercially reasonable notice so that technology conversions could be completed prior to its desired discontinuance date.

Idaho Power understands that the Commission has not automatically granted CenturyLink's request. Idaho Power appreciates this Commission's determination and is in the process of negotiating with CenturyLink for replacement services. As of this date, Idaho Power has seen some improvement with CenturyLink's newly offered service (the Ethernet over DS1 option), yet the construction delay still leaves Idaho Power without a reasonable service between CenturyLink's desired termination date and the estimated date for completion of construction to transfer to different technology. As such, Idaho Power requests that the Commission continue its suspension of CenturyLink's discontinuance request until after construction can be completed. Idaho Power believes that this is a reasonable approach to ensure that customers are provided solutions for their communications needs.

Very truly yours,

A handwritten signature in black ink, appearing to read "Julia A. Hilton", with a long horizontal flourish extending to the right.

Julia A. Hilton

JAH:csb

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of May 2014 I served a true and correct copy of IDAHO POWER COMPANY'S *EX PARTE* COMMUNICATION upon the following named parties by electronic mail:

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